



May 7, 2013

**Ex Parte**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: *Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51;*  
*Telecommunications Relay Services and Speech-to-Speech Services for Individuals with*  
*Hearing and Speech Disabilities, CG Docket No. 03-123*

Dear Ms. Dortch:

Sorenson Communications, Inc., (“Sorenson”) writes to respond to the letter of Sheri A. Farinha, which claims that Sorenson configures its Video Relay Service (“VRS”) equipment “to block consumers from leaving video mail messages through point-to-point calls using a competing service.”<sup>1</sup> As explained in two recent filings on this subject,<sup>2</sup> which are incorporated by reference, Sorenson does not block customers of other providers from leaving Deaf SignMail for its users. To the extent that Purple users are unable to leave video-mail messages for Sorenson customers, this is because of design differences between the two providers’ video-mail systems.

As explained in more detail in Sorenson’s previous filings, there are no standards governing the design of video-mail systems, and as a result, competing VRS providers have developed their own designs. Sorenson designed its Deaf SignMail system specifically to meet the needs of deaf consumers by allowing users of its nTouch videophone equipment to leave video messages even in low-bandwidth environments. As part of this design, each message is recorded locally on the calling user’s phone and uploaded to Sorenson’s servers using whatever bandwidth is available. This design requires phones to be able to record messages and store them locally, features which Sorenson introduced with its nTouch line of endpoints. Videophones that do not offer these features (including the Sorenson VP-200) are not capable of leaving Deaf SignMail.

Nor should the Commission deter innovation by forcing providers to adopt a one-size-fits-all approach to enhanced features like Deaf SignMail. Because VRS providers cannot

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<sup>1</sup> Letter from Sheri A. Farinha, Chief Executive Officer, NorCal Services for Deaf & Hard of Hearing, to Marlene H. Dortch, CG Docket Nos. 03-123 and 10-51 (filed May 6, 2013).

<sup>2</sup> See Letter from John T. Nakahata to Marlene H. Dortch, CG Docket Nos. 10-51 and 03-123 (filed May 1, 2013); Sorenson’s Opposition to Purple’s Request for Immediate Public Notice, CG Docket Nos. 03-123 and 10-51 (filed May 1, 2013).

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compete based on price, the Commission has allowed—and should continue to allow—they to compete based on their development of innovative “enhanced features” such as Deaf SignMail. While such competition may sometimes result in incompatibilities between the enhanced features offered by different providers, it will ultimately lead to better technology and service for consumers.

Sincerely,



John T. Nakahata  
Christopher J. Wright  
Mark D. Davis

*Counsel to Sorenson Communications, Inc.*

cc: FCC Commissioners  
Elizabeth Andrion, Advisor, Chairman’s office  
Priscilla Delgado Argeris, Advisor, Commissioner Rosenworcel  
Rebekah Goodheart, Advisor, Commissioner Clyburn  
Nicholas Degani, Advisor, Commissioner Pai  
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